

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

GARY J. ZENTNER, as Trustee of the
GARY J. ZENTNER and ROBIN C.
ZENTNER TRUST, on behalf of himself
and all others similarly situated, and
Derivatively on behalf of FALCON PLUS
STRATEGIES LLC,

Plaintiff,

v.

CITIGROUP INC., CITIGROUP
ALTERNATIVE INVESTMENTS LLC,
CITIGROUP GLOBAL MARKETS INC.,
FALCON PLUS STRATEGIES LLC,
FALCON PLUS LLC, FALCON
STRATEGIES TWO LLC, and AMACAR
GP, INC., DONALD LUCARDI, and
REAZ ISLAM,

Defendants.

Case No. 08-CV-6121 (SHS)
ECF Case

STIPULATION AND
~~PROPOSED~~ ORDER

IT IS HEREBY STIPULATED AND AGREED, by and between the undersigned
counsel for the parties herein, that:

(a) Defendants' last day to move, answer or otherwise respond to the
complaint in the above-captioned action shall be October 10, 2008;

(b) in the event any of the Defendants moves to dismiss the Complaint:

1. Plaintiff shall have ⁴⁵~~60~~ days from the date such motion is served to
serve opposition papers; and

2. Defendants shall have 30 days from the date opposition papers are
served by Plaintiff to serve reply papers.

A handwritten signature, likely "SHS", in the right margin of the document.

08/21/21 (SHS)

Dated: August 21, 2008
New York, New York

Respectfully submitted,

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& GARRISON LLP

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Inc. and Donald Lucardi*

ARKIN KAPLAN RICE LLP

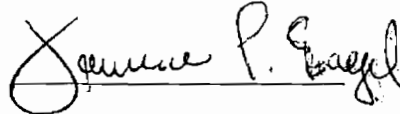
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Attorneys for Plaintiff Gary J. Zentner

8/22/08

SO ORDERED:


U.S.D.J.